

## REMARKS

In the Advisory Action dated March 8, 2005, the Examiner indicated that the response to the Final Office Action dated December 22, 2004, which was faxed on February 22, 2005, would not be entered because new issues were raised by the amendments proposed therein. In response, Applicants are filing a RCE and a Second Response to Final Office Action dated December 22, 2004, having a shortened statutory period for response extended two months set to expire on May 22, 2005. The Second Response to Final Office Action is filed in place of the Response to Final Office Action faxed on February 22, 2005. Please reconsider the claims pending in the application for reasons discussed below.

### ***Claim Rejections***

#### ***35 U.S.C. § 102(a)***

The Examiner rejected claims 1, 37, 38, 47, and 48 as being anticipated by *Blose* (U.S. Pat No. 4,822,081). In response, Applicants have amended claims 1, 37, 38, 47, and 48.

As amended, claim 1 includes similar limitations as claims 2, 3, and 31. Specifically, claim 1 includes the limitation of thread portions defining a thread cut in an opposite direction to an intended direction of rotation of a rotary expansion tool and include material properties that facilitate engagement of the threads due to rotary expansion thereof. *Blose* does not disclose a coupling arrangement adapted for expansion by a rotary expansion, whereby the thread portions are configured to facilitate engagement of the threads due to rotary expansion thereof. Rather, *Blose* seems to be silent regarding radial expansion. Thus, *Blose* also does not disclose thread portions configured to facilitate engagement of the threads due to rotary expansion thereof.

As amended, claims 37, 38, and 48 include similar limitations as claims 27-29. Specifically, amended claims 37, 38, and 48 include a limitation of a sealing member

made from a material capable of swelling when exposed to a selected fluid. *Blose* does not disclose a sealing member made from a material that swells when exposed to a selected fluid. Rather, *Blose* discloses a standard elastomer ring or metal seal to seal the box and pin members from leakage. (See *Blose*, col. 8, lines 18-22)

Additionally, as amended, claim 47 includes a similar limitation as claim 2. Specifically, amended claim 47 includes a limitation of an undercut groove configured to receive and retain the nose during radial expansion of the first tubular and the second tubular by a rotary expansion tool. *Blose* does not disclose an undercut groove configured to receive and retain the nose during radial expansion of the tubulars. Rather, as discussed above, *Blose* seems to be silent regarding radial expansion.

For the reasons discussed above, *Blose* therefore fails to teach each and every limitation of amended claims 1, 37, 38, 47, and 48 and this failure prevents *Blose* from anticipating amended claims 1, 37, 38, 47, and 48. Applicants submit that amended claims 1, 37, 38, 47, and 48 are in condition for allowance and respectfully requests withdrawal of the § 102(a) rejection of claims 1, 37, 38, 47, and 48. Further, claims 2, 4-18, and 31-32 depend from allowable amended claim 1 and these claims are allowable for at least the same reasons as claim 1.

**35 U.S.C. § 103(a)**

The Examiner rejected claim 1 as being obvious over *Evans* (U.S. Pat. No. 6,409,175) in view of *Blose*. In response, Applicants have amended claim 1.

As amended, claim 1 includes the limitation of a coupling arrangement adapted for expansion by a rotary expansion tool, whereby the thread portions define a thread cut in an opposite direction to an intended direction of rotation of the rotary expansion tool and include material properties that facilitate engagement of the threads due to rotary expansion thereof. As set forth above, *Blose* does not disclose a coupling arrangement adapted for expansion by a rotary expansion, whereby the thread portions are configured to facilitate engagement of the threads due to rotary expansion thereof. *Evans* also fails to disclose this limitation. Rather, *Evans* discloses an expansion device (pig P) that does not use rotation to expand the tubular as it is urged through the casing string by hydraulic pressure. (See *Evans*, col. 8, lines 7-18) Thus, *Evans* does not

disclose a coupling arrangement adapted for expansion by a rotary expansion, whereby the thread portions are configured to facilitate engagement of the threads due to rotary expansion thereof.

These references, either alone or in combination, therefore fail to teach or suggest all the elements recited in claim 1. This failure precludes *Evans* and/or *Blose* from rendering claim 1 obvious. Applicants therefore respectfully request withdrawal of the § 103(a) rejection of claim 1 and allowance of the same. Further, claims 2-12, 15-29, 31, and 32 depend from allowable amended claim 1 and these claims are allowable for at least the same reasons as claim 1.

### **New Claims**

Claims 49-64 have been added to more clearly define aspects of the present invention. Applicants submit that no new matter has been added. Applicants believe that the references cited by the Examiner do not teach or show expanding the threaded coupling arrangement with an expander tool having at least one radially extendable member, thereby causing the threaded portion to interlock therebetween to prevent separation of the first tubular from the second tubular, as recited in claims 49-55. Further, Applicants believe that the references cited by the Examiner do not teach or show forming the threaded coupling by threadly connecting a first tubular to a second tubular and interlocking a nose portion on the first tubular with a groove portion on the second tubular and then expanding the threaded coupling with an expander tool causing the threads to form an interference therebetween and causing the groove portion to accommodate any axial extension of the first tubular due to expansion thereof, thereby preventing separation of the first tubular from the second tubular, as recited in claims 56-60.

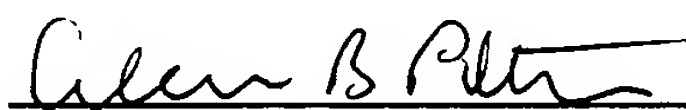
Additionally, Applicants believe that the references cited by the Examiner do not teach or show expanding the threaded coupling with an expander tool, wherein the male thread portion engages with the female thread portion by an interlocking and an overlapping relation between at least one back flank and at least one front flank in each threaded portion thereby ensuring the male and female thread portions do not radially separate during diametric expansion, as recited in claims 61-64. Therefore, Applicants

believe new claims 49-64 are in condition for allowance, and respectfully request allowance of the same.

### ***Conclusion***

In conclusion, the references cited by the Examiner, alone or in combination, do not teach, show, or suggest the invention as claimed. Having addressed all issues set out in the Final Office Action, Applicants respectfully submit that the claims are in condition for allowance and respectfully request that the claims be allowed.

Respectfully submitted,



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